

Case Number: 18 - CV - 04061 (ILG) (PK)**PROPOSED DISCOVERY PLAN**

	DONE	NOT APPLICABLE	DATE
A. ACTIONS REQUIRED <u>BEFORE</u> THE INITIAL CONFERENCE			
1. Rule 26(f) Conference held			10/31/2018
2. Rule 26(a)(1) disclosures exchanged			11/15/2018
3. Requests made:			
a. Medical records authorization		X	
b. Section 160.50 releases for arrest records		X	
c. Identification of John Doe/Jane Doe defendants		X	
d. Proposed Stipulation of Confidentiality	X		
4. Procedures for producing Electronically Stored Information (ESI) discussed	X		
B. SETTLEMENT			
1. Plaintiff to make settlement demand		X	
2. Defendant to make settlement offer		X	
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date to be completed)		X	
4. Settlement Conference (proposed date)		X	
C. PROPOSED DEADLINES			
1. Motion to join new parties or amend pleadings			4/7/2023
2. Initial documents requests and interrogatories		X	
3. All fact discovery to be completed (including disclosure of medical records)			4/7/2023
4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			4/7/2023
5. Expert discovery (only if needed)	Check here if not applicable <input type="checkbox"/>		

MEDICAL, SELF-LIQUIDATING NOTE/

Plaintiff expert proposed field of expertise:	VALUATION		
Defendant expert proposed field of expertise:	TBD SELF-LIQUIDATING NOTE/VALUATION		
	DONE	NOT APPLICABLE	DATE
a. Case-in-chief expert report due			7/17/2023
b. Rebuttal expert report due			9/5/2023
c. Depositions of experts to be completed			10/23/2023
6. Completion of ALL DISCOVERY			10/23/2023
7. Joint status report certifying close of all discovery and indicating whether dispositive motion is anticipated			11/17/2023
8. If District Judge requires Pre-Motion Conference, date to make request			11/28/2023
9. If District Judge does not require Pre-Motion Conference, date to submit briefing schedule			11/28/2023
10. Joint Pre-Trial Order due (if no dispositive motion filed)			1/3/2024
D. CONSENT TO MAGISTRATE JUDGE JURISDICTION			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motion?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
2. All parties consent to Magistrate Judge jurisdiction for trial?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY			
1. Motion for collective action certification in FLSA cases		X	
a. Response due		X	
b. Reply due		X	
2. Motion for Rule 23 class certification		X	
a. Response due		X	
b. Reply due		X	

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

Peggy Kuo

PEGGY KUO

United States Magistrate Judge

January 31, 2023

Date